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cc Busby
Dale

States Government

Department of Energy

JE
DATE 11-20-92

OCT 20 10 12 AM '92 Rocky Flats Office

memorandum

ACTION *Kersh*

DIST *ENC*

- BENJAMIN A.
- BERMAN, H S
- CARNIVAL, G J
- COPP, R D
- CORDOVA, R C
- DAVIS, J G
- FERRERA, D W
- HANNI, B J
- HEALY, T J
- HILBIG, J G
- IDEKER, E H
- KERSH, J M
- KIRBY, W A
- KUESTER, A W
- LEE, E M
- MANN, H P
- MARX, G E
- MCKENNA, F G
- MONTROSE, J K
- MORGAN, R V
- PIZZUTO, V M
- POTTER, G L
- RILEY, J H
- SANDLIN, N B
- SATTERWHITE, D G
- SCHUBERT, A L
- SHEPLER, R L
- SULLIVAN, M T
- SWANSON, E R
- WHITE, B L
- KINSON, R B
- SON, J M
- ZANE, J O

- Benedetti* X
- Omdt* m X
- Nesta* S X
- Moore* W X
- Busby* W X
- Smith* D X
- Setlock* G ACT
- Hinds* X
- meyers* X

CORRES CONTROL ☒ ☒
TRAFFIC ☐ ☐

OCT 19 1992

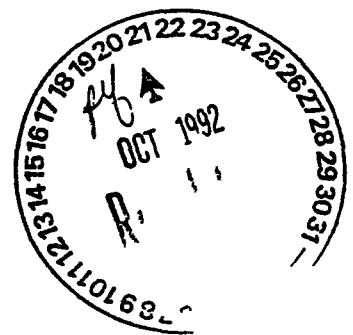
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ERD BKT 12086

Operable Unit No 1 NEPA/CERCLA Action

J M Kersh Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats Inc

Robert Benedetti Acting Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats Inc



It has come to our attention through informal communication with your staff that the carcinogenic risk levels to be presented in the baseline risk assessment section of the Draft Phase I RFI/RI Report for OU 1 will likely fall in the risk range of 1X10(4) to 1X10(6) In fact for polycyclic aromatic hydrocarbons in surficial soils the risk may exceed 1X10(4) While DOE/RFO is not recommending that cleanup achieve a risk level of 1X10(6) it is possible that EPA and/or CDH may require DOE to achieve cleanup to this risk level

DOE Order 5400 4 CERCLA requirements requires that the procedural and documentation requirements of CERCLA and NEPA be fully integrated. For OU 1 it is likely that this will require the preparation of an EA/FS/CMS document. We have not received a copy of the environmental checklist for this NEPA/CERCLA action nor a request for a determination of the level of NEPA documentation from EG&G Since the IAG deliverable date for the Draft FS/CMS Report for OU 1 is March 31 1993 we request that EG&G submit the necessary information to DOE/RFO so that a determination can be made regarding the level of NEPA documentation required for the OU 1 FS/CMS Report. Since a possibility exists that we may be held to a cleanup level of 1X10(6) we request that EG&G initiate the FS/CMS process assuming this level of cleanup

We do not want a delay in this IAG deliverable document to result from DOE NEPA requirements Thus we request that EG&G take the appropriate actions immediately to assure that NEPA/CERCLA integration is not a reason for any delays The information package regarding the level of NEPA documentation required for the OU 1 FS/CMS should be submitted to DOE/RFO by November 20 1992

Reviewed for Add ssee
Corr & Control RFP

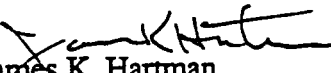
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DATE BY

Ref Ltr #

ADMIN RECORD

OCT 19 1992

Questions or concerns regarding this memorandum should be directed to Scott Grace of my staff at extension 7199


James K. Hartman
Assistant Manager
for Environmental Management

cc
F Lockhart, ERD RFO
R Schassburger ERD RFO
P Powell ERD RFO
S Grace ERD RFO
B Thatcher ERD RFO
M Arndt EG&G
S Nesta, EG&G
W Moore EG&G
W Busby EG&G
D Smith EG&G